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NPI Information for Health Care Providers

While CMS guidance initially made it clear that May 23, 2007 was the final deadline for covered entities, other than small plans, to comply with HIPAA's NPI provisions, with consideration of ongoing challenges nationally, CMS/OESS outlined its relaxed approach to enforcement of HIPAA's NPI provisions.

Through May 23, 2008 CMS/OESS will not impose penalties on covered entities that deploy contingency plans if they have made reasonable and diligent efforts to become compliant and, in the case of health plans, to facilitate the compliance of their trading partners.

With this in mind AHCCCS has elected to deploy an NPI contingency plan through December of 2007. The details of this plan as well as other relevant information may be found on the AHCCCS NPI webpage.

Current NPI Webpage -

National Provider Identification (NPI) Documents

While CMS guidance initially made it clear that May 23, 2007 was the final deadline for covered entities, other than small plans, to comply with HIPAA's NPI provisions, with consideration of ongoing challenges nationally, CMS/OESS outlined its relaxed approach to enforcement of HIPAA's NPI provisions.

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With this in mind AHCCCS has elected to deploy an NPI contingency plan through December of 2007. The details of this plan as well as other relevant information may be found on this page.

This section contains links to a page with preliminary information, and to documents related use of the National Provider Identification (NPI) number. The following documents are included in this section:

- AHCCCS Dual Use Definitions
- <u>Provider Definitions</u>
 [Posted November 2, 2007, PDF]
- NPI Will You Be Ready? (NPI Preliminary Information)
- CMS Enforcement Guidance Overview [Posted May 15, 2007, PDF]
- AHCCCS NPI Contingency [Posted May 15, 2007, PDF]
- NPI Consortium
- NPI Fact Sheet
- NPI Provider Type
- NPI Recommendation from NCVHS to DHHS
- NPI Reporting Requirements

All documents are provided in PDF format. To access the Adobe Acrobat Reader site for a free, downloadable version of this program, click here:



AHCCCS Dual Use Definitions

Legacy Identifier:

A "Legacy Identifier" is any identifier previously used to identify a health care provider prior to NPI. After the compliance date as stated in the AHCCCS Contingency Plan, only a NPI may be used to identify a health care provider in standard transactions. Legacy identifiers include AHCCCS Registration Numbers, Health Plan Registration Numbers, Medicare PINS, Blue Cross provider numbers, and other identifiers.

AHCCCS Dual Use:

AHCCCS will accept NPIs on claims and encounter transactions as of 1/1/2007. If the NPI is sent on a transaction, only the NPI will be used for processing. If the NPI has not been registered/enrolled by AHCCCS [NPI not on file with AHCCCS] the transaction will fail. Even though the "legacy identifier" may be included on the transaction, the NPI will be the ONLY identifier used to process transactions. AHCCCS will not attempt to process the transaction using the NPI and if the NPI is not on file, then check to see if the Legacy Identifier is also on the transaction and use it to process the transaction.

NPI Fact Sheet

NPI Fact Sheet [PDF, 28Kb]

Effective January 23, 2004, the final rule regarding the National Provider Identifier (NPI) was published. CMS started assigning NPI numbers to providers last May, and beginning in May 2007 NPIs will be required. This <u>document</u> contains additional facts related to NPI usage.

NPI Provider Type

NPI Provider Type [PDF, 16.16Kb]

This <u>document</u> contains a list of NPI Provider Types, descriptions and an indicator which states whether the Provider Type requires an NPI.

NPI Recommendation from NCVHS to DHHS

- NPI Recommendation NCVHS to DHHS 02-15-07 [PDF, 72Kb]
- NPI Recommendation NCVHS to DHHS 11-29-06 [PDF, 66Kb]

AHCCCS Contingency Key Dates:

AHCCCS NPI Contingency Dates:

837 and Paper Claims Transactions

Primary (rendering/service) providers SHOULD use an NPI (if required for their provider type), but <u>AHCCCS will accept submission of both the NPI</u> and/or other legacy identifiers until 1/1/2008.

Secondary providers (referring, attending, operating) (if required or submitted) SHOULD use an NPI, but <u>AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 3/1/2008.</u>

837 Encounter Transactions

Primary (rendering/service) providers SHOULD use an NPI (if required for their provider type), but AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 1/1/2008.

Secondary providers (referring, attending, operating) (if required or submitted) SHOULD use an NPI, but <u>AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 3/1/2008.</u>

NCPDP and Paper Claims Transactions

Primary (rendering/service) providers SHOULD use an NPI, but <u>AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 1/1/2008.</u>

Secondary providers (prescribing providers) SHOULD use an NPI, but AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 3/1/2008.

NCPDP Encounter Transactions

Primary (rendering/service) providers SHOULD use an NPI, but <u>AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 1/1/2008.</u>

Secondary providers (prescribing providers) SHOULD use an NPI, but AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 3/1/2008.

270/271 Transactions

Providers SHOULD use an NPI (if required for their provider type), but AHCCCS will accept submissions of both the NPI and/or other legacy identifiers until 1/1/2008.

On-Line Web Based Transactions, claim status lookup

Providers SHOULD use an NPI (if required for their provider type), but AHCCCS will accept both the NPI and/or other legacy identifiers until 1/1/2008.

Provider Registration Records

Provider records SHOULD contain valid NPI information (if required for the provider type), but <u>AHCCCS will not suspend any Provider records for lack of an NPI until 5/23/2008.</u>